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HILTON GRAND VACATIONS CLUB, LLC

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MELISSA PETERS,

Plaintiff,

v.

HILTON GRAND VACATIONS CLUB, LLC;  
DOES I through X, inclusive; and ROE  
CORPORATIONS 1 through X, inclusive,

Defendants.

Case No. 2:24-CV-02162-CDS-EJY

**STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND DISCOVERY  
DEADLINES**

**(FIRST REQUEST)**

Plaintiff Melissa Peters and Defendant Hilton Grand Vacations Club, LLC hereby stipulate to extend the discovery deadlines in this case by ninety (90) days according to the schedule set forth below. This Stipulation is entered in good faith and not for the purpose of undue delay.

**I. STATUS OF DISCOVERY**

The parties held a scheduling conference under Rule 26(f) of the Federal Rules of Civil Procedure on April 2, 2025. During that conference, the parties agreed to serve initial disclosures on or before April 16, 2025, which is fourteen days from the 26(f) conference and approximately three weeks before the parties' currently scheduled Early Neutral Evaluation. The parties have not yet completed any additional discovery.

**II. DISCOVERY THAT REMAINS TO BE COMPLETED**

The parties anticipate completing written discovery in the immediate future, including requests

1 for production of document, written interrogatories, and requests for admissions. The parties will also  
2 schedule party and witness depositions as well as the deposition of Hilton's corporate representative  
3 under Rule 30(b)(6). In addition, the parties are in the process of assessing whether any expert  
4 testimony will be necessary to the claims and defenses raised in this matter. Finally, the parties  
5 anticipate certain third-party discovery efforts, including subpoenas that may result in additional  
6 witness depositions.

### 7 **III. SPECIFIC DESCRIPTION OF WHY EXTENSION IS NECESSARY**

8 Under Local Rule 26-3, the Parties acknowledge that a stipulation to extend a deadline set forth  
9 in a discovery plan must be submitted to the Court no later than twenty-one (21) days before expiration  
10 of that deadline, and that a request made within twenty-one (21) days must be supported by a showing  
11 of good cause. This request is submitted prior to twenty-one (21) days before the next discovery  
12 deadline (Initial Expert Disclosures due May 5, 2025). Thus, LR 26-3's heightened good-cause  
13 standard does not apply to a request to extend the expert-disclosure deadline or any deadline thereafter.

14 The requested extension is necessary to allow the parties to fully explore the need for expert  
15 witnesses in this matter and to provide sufficient time to complete the written discovery and  
16 depositions necessary to develop the claims and defenses at issue in this case. At present, neither party  
17 can adequately assess whether expert witnesses are necessary without having first received the other  
18 party's initial disclosures and discovery responses. The request for ninety additional days to perform  
19 discovery will likely be sufficient to allow the parties to explore the need for experts. Moreover, an  
20 additional ninety days to complete discovery will allow the parties to attend an Early Neutral  
21 Evaluation (on May 5, 2025) and possibly narrow the issues for which discovery is needed. However,  
22 even if the Early Neutral Evaluation does not result in a settlement, the requested ninety days should  
23 provide sufficient time to complete the discovery necessary to this matter.

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1 **IV. PROPOSED SCHEDULE FOR COMPLETING REMAINING DEADLINES**

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	Current Deadline	Proposed New Deadline
3 Amend Pleadings and Add Parties	Expired	Expired
4 Expert Disclosures	May 5, 2025	August 4, 2025 <sup>1</sup>
5 Rebuttal Expert Disclosures	June 4, 2025	September 3, 2025
6 Discovery Cut-Off	July 2, 2025	September 30, 2025
7 Dispositive Motions	August 1, 2025	October 30, 2025
8 Pretrial Order	September 1, 2025	December 1, 2025 (Nov. 29 is a Saturday) (If dispositive motions are 9 filed, the deadline shall be 10 suspended until thirty (30) 11 days after the decision of the dispositive motions or further order of the Court.)

12 Based on the foregoing stipulation and proposed deadlines, the Parties respectfully request that  
13 the Discovery Plan and Scheduling Order deadlines be extended by ninety (90) days so the Parties  
14 may conduct remaining discovery as set forth herein.

15 Dated: April 14, 2025

Dated: April 14, 2025

16 Respectfully submitted,

Respectfully submitted,

18 /s/ Kristina S. Holman

/s/ Andrew S. Clark

19 Kristina S. Holman, Esq.  
HOLMAN LAW OFFICE

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Andrew S. Clark, Esq.  
LITTLER MENDELSON, P.C.

20 Attorney for Plaintiff  
21 MELISSA PETERS

Attorneys for Defendant  
HILTON GRAND VACATIONS CLUB, LLC

22  
23 **IT IS SO ORDERED.**

24 Dated: April 14, 2025

25   
26 UNITED STATES MAGISTRATE JUDGE

27 4937-4444-2420 / 116024.1032

28 <sup>1</sup> Deadline fell on Sunday and was moved to the following Monday.